

Anti-Bribery Policy

We value our reputation for ethical behaviour and for financial honesty and reliability. We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation. Our aim therefore is to limit exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees so that you can recognise and avoid the use of bribery by yourself and others;
- Encouraging all employees to be vigilant and to report any suspicion of bribery, providing suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any results for prosecution;
- Taking firm and vigorous action against anyone involved in bribery. We prohibit the offering, giving and the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on our behalf in order to gain any commercial, contractual or regulatory advantage for us in a way which is unethical, or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Further Clarification

We recognise that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in your personal gain or advantage to you or any person or body associated with you, and which is intended to influence them to take action which may not be solely in the interests of us or of the person or body employing them or whom they represent. This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality (i.e. an invitation to a sports event);
- The giving of a ceremonial gift on a festival or at another special time;
- The use of any recognised fast-track process which is available to all on payment of a fee;
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only. Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to Management with responsibility for this policy before proceeding.

We will investigate seriously any actual or suspected breach of this policy, or the spirit of this policy. You may be subject to disciplinary action, which may ultimately result in your dismissal. In the case of third parties found to be bribing or attempting to bribe our employees, a senior officer, a supplier or customer they will be informed in writing that business dealings will be ceased and appropriate authorities will be informed.

Acceptance of Gifts and Hospitality

In order to protect both our employees and the reputation of the Company from accusations of bribery or corruption, you are not permitted, directly or indirectly, to accept any gift, hospitality, reward or other benefit from any source (including organisations, other employees and members of the public) with whom you have been brought into contact or maintain contact only by reason of the duties for which you are employed by us, except in the following circumstances:

Occasional gifts which are regarded as trivial and where the nominal value received by any one person is under £10.00 e.g. diaries, calendars, pens etc.

Conventional hospitality e.g. annual dinner of a body with which you have day-to-day contact, or working lunches in the course of official visits, where the frequency and the total cost of hospitality is reasonable and would not be construed by an impartial observer as affecting your judgement regarding the work for which you are employed. Employees who are in doubt about the nature, regularity or value of any such hospitality or benefit must receive express written authorisation from your superior before accepting the hospitality or benefit. It is not possible to define 'reasonable' and you must use your discretion. In cases of corporate hospitality it would normally be expected, for example, that any hospitality where the value exceeds £50.00 be referred for authorisation.

Where a more valuable gift or benefit is offered from which we in general might benefit, rather than an individual employee, acceptance will be at the discretion of senior Management. Employees responsible for the purchase of supplies, equipment or services must take particular care to ensure that there can be no criticism that unequal treatment has been given to suppliers involved in tendering processes through the acceptance of gifts or other benefits. You should always bear in mind the need not to behave so that the impression might be given or interpreted by any member of the public, or organisation with whom you deal that they may be influenced by any gift, benefit or behaviour to show favour or disfavour to any person or organisation in respect of the work for which you are employed. If you are in any doubt as to the propriety of receiving any gift or hospitality then you must consult your superior.

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company. Suitable channels of communication by which you or others can report confidentially any suspicion of bribery can be found in our Whistle Blowing Policy.